6334 W. 80th St.
Los Angeles, Ca. 90045
March 27, 1975

Mr. Douglas Leisz, Regional Forester
630 Sansome St.
San Francisco, Ca. 94111

Dear Mr. Leisz:

Following are our comments on the Draft Environmental Impact Statement on the proposed development of Mineral King which was published by the Forest Service in December, 1974. We feel the Draft Environmental Impact Statement is little more than a defense of the proposed Disney-Forest Service development plan.

In a press release on May 3, 1972 you stated that "...the approved master plan for Mineral King would have to be amended to be in accordance with the concept of sole access by electric railway." Such access would be less damaging to the environment than an improved highway for possible access by bus, but apparently an improved highway is still being planned. According to Professor Hartesveldt of the University of California at San Jose, a new road will do great harm to the sequoias and the ecology of the Park and Forest in general. Professor Hartesveldt reached these conculsions after a thorough study. Have you included this study as part of the Draft Environmental Impact Statement? Studies have shown that the highway would almost certainly cause damage to the sequoia trees as it would, in all probability interrupt the flow of sub-surface water to the trees during the summer. It is thought this water flow may be vital to the giant trees, however if the road is improved and the trees are damaged or destroyed by the interruption of water flow, it will be too late to remedy the situation after the flow of water has been interrupted. This possibility must be proven or disproven before risking these centuries-old trees.

The avalanche danger at Mineral King has never been solved. Both Disney and Forest Service avalanche experts have been unable to control the severe avalanches which have plagued the valley throughout its history. In fact, the avalanche expert who was employed by Disney to study methods of avalanche control at Mineral King reported to Disney after the disastrous avalanches of 1969 that the development was unfeasible at Mineral King and the company should look for another site for its development. To our knowledge, this report was never publicized by Disney or the Forest Service and plans for the development continued. We are sure the Disney company would be happy to transfer its plans to the Independence Lake area north of Tahoe should the Forest Service decide to abandon this ill-conceived plan. Was the above mentioned report a part of the Draft Environmental Impact Statement? We are sure this report is still available.

The planned resort will gobble up all of the water at Mineral King and it will have to be purified before it is returned to the stream bed. This has not proven satisfactory at Tahoe where the salts used to purify the water have had a deleterious effect on the plant life. It would almost certainly have a bad effect on the water quality in Kaweah Lake which is used for irrigation. Has this been taken into account in the Draft Environmental Impact Statement?

We saw no mention of the disastrous impact of the proposed resort on smaller flora of the region. Dr. Theodore Niehaus, a botanist at the University of California at Berkeley reported in a letter in 1971, "...I am working along with others on a Rare and Endangered Plant List of California. The list has not been made public yet, but the following two species are in the Mineral King area." The two species named by Dr. Niehaus were Brodiaea insignis (Jepson) Niehaus and Phacelia orogenes. The genus Brodiaea has been studied thoroughly by Dr. Niehaus during the last 18 years and a monograph is available from the University of California Botany Department. Dr. Niehaus further stated that the Brodiaea insignis population located along the Mineral King road must not be disturbed by road building or this population, one of the two

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known to exist will be wiped out. The other population on the south fork road is very snall and thus both sites are of critical importance to survival of the species. Transplanting to a new site is a highly questionable solution and preservation of the species by this means is impossible. Concerning Phacelia orogenes, Dr. Lincoln Constance, Department of Botany, U.C. Berkeley is the world's authority. In the case of this plant, any land clearing for ski runs, roads, etc. would certainly upset ecological balance. Was this noted in the Draft Environmental Impact Statement? Rare and endangered plants should certainly be taken into account in any environmental impact study.

In addition to the impact of the proposed development on the flora of the region, the impact on the wildlife will be disastrous. The parking facility at the proposed Oak Grove site will be located in the middle of the winter range of the Mineral King deer herd. And the herd is further threatened by the planned facilities in and near the fawning areas in Mineral King itself. It is impossible to restrict human access from these areas during fawning season due to the crowds and hoards of people anticipated at the proposed development. And of course, the project will restrict the environment of the California condor, the American peregrine falcon, the wolverine, the California bighorn sheep, the spotted owl and the pine marten. The area will no longer be habitable to these birds and animals. This is appalling in a National Game Refuge.

In addition to the many other reasons for abandoning this reprehensible plan, there are many people who feel that the public will be better served by preserving Mineral King as it is today, to be enjoyed now and in the future. We have in our possession 27,887 names and addresses of people who have signed petitions opposing the proposed development of Mineral King. Several thousand additional names were turned in to the Sierra Club Legal Defense Fund in San Francisco. We were able to collect this number of names in spite of the fact that the Forest Service refused to allow us to display these petitions at Mineral King and even went so far as to confiscate our petitions, fact sheets and bumper strips without any documents of search and seizure. At about the same time, the Forest Service had on display in the Mineral King Guard Station brochures favoring the development of Mineral King by Disney. Later the Forest Service refused to allow us to display our petitions on the public bulletin boards at Mineral King. Thus we had to collect many of these names at places other than Mineral King. We believe this was done purposely by the Forest Service to keep this information from the people who actually used and enjoyed the area. In spite of this harrassment by the Forest Service, we have probably amassed over 30,000 names.

We feel Mineral King should be available to anyone who wishes to go there, not just those who can afford to pay $15.60 apiece per night to stay in resort hotel facilities. No private resort should be built on the public land, thus eliminating the possibility of the use of that land by the general public to whom it belongs.

We feel the Mineral King store and post office should be rebuilt by the Disney company, as that company now owns the land on which the store was located. If this company is truly concerned with conservation and with the good of the public, it will agree that this is the best way to develop Mineral King. It will also provide adequate public parking, if the road is, indeed to be maintained. The old dump, which is also owned by Disney should be covered over and made into a parking lot. It is hidden from the valley floor and would provide a good parking area. There should also be space available for cars to be parked longer than 7 days. This limitation which is now being enforced is discriminatory against back packers who plan trips of longer than 7 days. Adequate parking areas should be constructed at various points in the valley without disturbing existing buildings. (If access is to be by rail, parking areas will not be necessary .) We suggest that rental cabins be built in the store/post office area for summer visitors who are unable to camp and that cabins for winter visitors (cross-country skiers and snow shoers) be built either in the valley or below the valley. And to maintain the primitive beauty of the valley, the kiosk constructed by the Forest Service on the site of the old Davis cabin should be dismantled, as it is an eyesore to the surrounding area. We further suggest that all the area without buildings and above and beyond the Mineral King road be included in wilderness area, as it

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is certainly of prime wilderness area quality.

In closing, we suggest that the Mineral King National Game Refuge be removed from Sequoia National Forest since the Forest Service has not managed the valley in the manner in which Congress intended it to be managed when it established it in 1926. It should be made a part of Sequoia National Park so that it may be preserved for the enjoyment of the public for the present and the future without the danger that it will be exploited and ruined. We are skiers, but feel Mineral King should thus be used by the public without causing serious damage to its fragile environment and it should be preserved for generations to come.

Sincerely,

Richard Koch, M.D.

Jean Koch

cc: The Honorable Alphonzo Bell
The Honorable John Krebs
The Honorable Alan Cranston
The Honorable John Tunney

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